



South Coast Air Quality Management District

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April 24, 2008

Mr. Gerardo Rios – via email (R9AirPermits_sc@epa.gov)
USEPA Region IX, Mail Stop AIR-3
75 Hawthorne St.
San Francisco, CA 94105

Subject: Response to EPA comments for Edison Mission Energy's (EME's) Proposed Valle Del Sol, LLC (VSE) Project (Facility ID No. 146534), to be located at 29500 Rouse Road, Romoland, CA 92585; (05-AFC-3)

Dear Mr. Rios:

This is in reference to Edison Mission Energy's (EME's) Proposed Valle Del Sol, LLC (VSE) Power Plant Project and VSE's Application for Certification (AFC) and Title V Application for a Permit to Construct filed with the California Energy Commission (CEC) and the South Coast Air Quality Management District (AQMD), respectively. As you know, VSE has proposed to construct a 500 net megawatt (MW) power plant, Valle Del Sol, LLC, at the above described location. During the 45-day review period, EPA provided comments on the proposed Permit to Construct and Title V Permit for the above facility as listed in the email from EPA to AQMD dated March 7, 2008. Below is AQMD's response to those comments:

Comment No. 2

Conditions D12.3 and D12.4 establish temperature and differential pressure ranges for the catalyst. EPA notes that no provisions are made to account for operation during the startup period, during which the catalyst may not be able to comply with the required ranges. If the emission units can not comply during the startup period, the permit should be revised to specify what the temperature and pressure requirements are during the start up period.

AQMD Response:

AQMD agrees with EPA regarding the need for maximum temperature and pressure limits and will revise conditions D12.3 and D12.4 to include a maximum temperature and pressure limit which cannot be exceeded during the start-up period. AQMD believes that there is no need for a range as long as the maximum temperature and pressure are specified.

Comment No. 4

While Condition C1.4 limits the annual hours of operation for the turbines, and Condition D12.7 requires the installation of a non-resettable elapsed time meter, EPA could not locate any requirement to monitor and record the hours of operation in Section K of the permit. Please add a condition requiring at least monthly monitoring and recordkeeping of the elapsed time meter readings.

AQMD Response:

Electrical generating facilities located in Zone 1 as described in AQMD Rule 1309.1(b)(5)(A)(ii) are not subject to a limitation on annual hours of operation. There are also no other applicable air quality rules or regulations which

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limit the annual hours of operation. Therefore, the draft permit contains no condition limiting the annual hours of operation or requiring the installation of a non-resettable elapsed time meter.

Comment No. 5

EPA notes that for several of the conditions related to source testing, found in Subsection D of Section H of the permit (e.g. see Condition D29.3), the required test method is listed as "Approved District Method." Since specific SIP approved test methods are available for each of these tests, the Title V permit must list the specific test methods required to be used. The District may add a condition stating that an alternative test method may be allowed, but only upon both District and EPA concurrence. In a similar manner, many of these same conditions specify that the required Averaging Time is "District-approved averaging time." Again each specific test method has a corresponding required averaging time. Please revise all Conditions in Subsection D to provide specific test method and averaging time requirements.

AQMD Response:

AQMD concurs with EPA and will make the following revisions to the appropriate source testing conditions: The required averaging time for PM will be revised from "District approved averaging time" to read "4 hours". The required test method for PM will be revised from "Approved District Method" to read "Method 5". The required test method for SO_x will be revised from "Approved District Method" to read AQMD Method 307-91." The required test method for VOC will be revised from "Approved District Method" to read "AQMD Method 25.3". In addition to the test methods stated above, please note that the appropriate source test conditions have been revised to allow the use of alternative test methods as approved by AQMD, CARB and EPA.

If you have any questions regarding this project, please contact Mr. Kenneth L. Coats at (909) 396-2527 kcoats@aqmd.gov or Mr. John Yee at (909) 396-2531 jyee@aqmd.gov.

Sincerely,



Michael D. Mills, P.E.
Senior Manager
General Commercial & Energy Team
Engineering & Compliance

cc: Mr. Robert Worl, CEC
Mr. Thomas J. McCabe, EME
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